



**State of Israel**  
**Ministry of Justice**  
**Jerusalem**

**To the Competent Authorities of the Federative Republic of Brazil**

**Supplemental Request for Legal Assistance in a Criminal Matter**

1. In accordance with the United Nations Convention against Illicit Traffic in Narcotic Drugs and Psychotropic Substances of 1988, the State of Israel hereby requests that the authorities of the Federative Republic of Brazil (hereinafter: "**Brazil**") grant legal assistance and letters rogatory, in accordance with Brazilian law. This assistance is required in order to procure evidence relating to serious criminal offences, the details of which are set out below.
2. This Supplemental Request supplements the Request for Legal Assistance in a Criminal Matter in the matter of Israeli national Yosef Cohen, dated November 16, 2016, attached hereto (hereinafter: "**the Original Request**"). The details of the Original Request hereby is incorporated into this Supplemental Request.
3. This request is signed and submitted by the Director of the Department of International Affairs in the Ministry of Justice of the State of Israel, who is authorised to submit such requests on behalf of the State of Israel.

## Statement of Facts

4. As stated in the Original Request, the Israel Police are investigating suspicions that in 2016, Israeli national Yosef (a/k/a Joseph, a/k/a Yossi, a/k/a Yosi) Cohen, d/o/b January 19, 1954, Israeli identity number 051986669, Israeli passport number 14471661 (hereinafter: "**Cohen**") violated provisions of the Israeli law (the Penal Law of 1977, the Dangerous Narcotics Ordinance [New Version] of 1973 and the Prohibition against Money Laundering Law of 2000) in that he participated in a conspiracy to export large quantities of the dangerous narcotic cocaine from places in South America and import said narcotic into Israel, while also committing crimes of money laundering.
  
5. According to the evidence gathered to date, Cohen committed his crimes in conspiracy and with the participation of the following persons: **Amos Sulami; Yaakov Israeli; Moshe Famili; Uri Saadon and Nayef Abu Assa**. Said persons, along with Cohen will be referred to hereinafter as "**the co-conspirators**". עליכם להעביר לי את מספר הדרכונים של אנשים אלו, לרבות דרכונים זרים
  
6. The Brazilian authorities conducted surveillance operations regarding this manner, including those conducted on June 10, 2016 involving Amos Sulami, Geva (איות שמו?) Sulami (מי הוא ומה הקשר בינו לפרשה זו?) and Amir Yefet (איות ?מה פתום אתם מזכירים את האנשים האלו ?) (מי הוא ומה הקשר בינו לפרשה זו?) (שמו?) According to information provided to the Israel Police by the Brazilian investigative authorities, during the surveillance conducted on June 10, 2016, Geva Sulami and Amir Yefet met with Philip Menashe, entered an automobile driven by Philip Menashe (מי הוא ומה הקשר בינו לפרשה זו?) (איות שמו?) and travelled with him from Brazil to Bolivia, entering Bolivia. (באיזה תאריך הם נכנסו לבוליביה?)
  
7. On May 25, 2017 an indictment was filed in the District Court of Tel Aviv-Jaffa against co-conspirators, with the exception of Nayef Abu Assa. On July

31, 2017 an indictment was filed also against the latter. The court has been petitioned to join the two above indictments.

### **Purpose of this Supplemental Request**

8. The purposes of this Supplemental Request are as follows: a) to request specific additional evidence; b) to request the testimony of relevant Brazilian residents during the Israeli trial or trials.

### **Details of the Request**

#### **The additional evidence sought:**

9. Lists the entrances into Brazil and the departures from Brazil of all of the co-conspirators during the years 2015 and 2016. Please state which of these entrances and departures took place on the border between Brazil and Bolivia.

10. All **investigation reports** of the Brazilian authorities, including but not limited to **surveillance reports, photographs and videos**, relevant to this matter. **(האם אתם בטוחים כי יש דו"חות אך ורק לגבי פעולות העקוב ביום 10.6.2016?)**

11. Documents or information the co-conspirators' air travel within Brazil of the co-conspirators **and their purchases of tickets for domestic flights** **(האם זה מה שאתם מבקשים? – אכפת להם מי קנה את הכרטיסים?)** during the years 2015 and 2016. It should be noted that according to information conveyed to the Israel Police, **Geva Sulami and Amir Yefet** were observed boarding a domestic Brazilian flight on June 10, 2016, while under surveillance by the Brazilian authorities. **(התבקשתי לבקש רשויות ברזיל תערכו בדיקות מול חברות התעופה אך לא ברור כי רשויות ברזיל חייבים לקבל מידע או מסמכים אלו מחברות התעופה – ייתכן שמידע זה נמצא במערכת הממחשבת של רשויות ברזיל).**

#### **The testimony sought:**

12. The Brazilian authorities are requested to ask the following persons whether they are willing and able to travel to Israel to testify before the Israeli court during the trial; if so, Israel requests their testimony in person before the court

in Tel Aviv; if not, Israel requests their testimony in the afore-reference trial or trials by means of video conferencing:

- a) **A representative of the Golden Tulip Paulista Plaza Hotel**, located at Alameda Santos 85, 01419-000, Sao Paulo, who will be able to testify as to the information provided by the Brazilian authorities in response to the Original Request;
- b) **A representative of the Brazilian authorities** who will be able to testify regarding the above requested information regarding the entrance into and departures from Brazil of the co-conspirators;
- c) **The investigators who conducted the relevant surveillance**, including but not limited to those who took the afore-referenced photographs.

### **Supplementary**

13. The assistance requested is necessary for the trial or trials of the co-conspirators.

14. The State of Israel will submit any additional information, which the authorities of Brazil may require in order to enable them to accede to this Request.

15. Inquiries regarding the matters set forth in this request should be directed to Attorney Nina Mansur of the Department of International Affairs in the Office of the State Attorney. Her telephone number is 972-2-5419609, mobile phone number is 972-506216206, fax number is 972-2-5419644 and her e-mail address is [NinaH@justice.gov.il](mailto:NinaH@justice.gov.il).

16. The State of Israel takes this opportunity to express its appreciation to the authorities of Brazil for their assistance in this case and to assure reciprocity.

Jerusalem, this \_\_\_\_ day of \_\_\_\_\_, 2017  
, this \_\_\_\_ day of Elul, 5777

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Yuval Kaplinsky  
Director  
Department of International Affairs  
Office of the State Attorney  
Ministry of Justice  
State of Israel